



142 West 57th Street, Suite 4A, New York, NY 10019

Howard J. Kaplan
Partner
Email: hkaplan@kaplanrice.com
Direct: 212.333.0219

August 17, 2020

VIA ECF

The Honorable John G. Koeltl
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: *The Legacy Agency, Inc. v. Brodie Scoffield, Meghan Whelan, and Chris Amezquita*, No. 1:20-cv-5771 (JGK).

Dear Judge Koeltl:

We represent Petitioner The Legacy Agency, Inc. ("TLA") in this action.

TLA consents to the request to seal the MLBPA confidential arbitration awards and any references to the proceedings in such arbitrations (including briefs submitted, testimony given, or exhibits admitted) as directed by the MLBPA. (Dkt. No. 14, Ex. A).

TLA objects to Respondents' attempt to make their jurisdictional arguments in this motion to seal, and respectfully refers the Court to its Opposition to Respondents' Petition to Vacate Arbitration Award and Reply in Further Support of TLA's Verified Petition to Confirm filed under seal (Dkt. No. 15).

TLA has today filed a corrected opposition addressing certain formatting and typographical errors. We have provided a redlined copy to Respondents. We respectfully request that the Court accept this brief for filing. We are prepared to file a motion for leave if the Court requires a formal motion.

Respectfully submitted,

/s/ Howard J. Kaplan

Howard J. Kaplan

cc: All Counsel of Record
Robbie Guerra, Esq.